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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
MICHELLE YANG IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS  
SUPPLEMENTAL BRIEF IN  
SUPPORT OF ITS MOTION TO  
COMPEL UBER SOURCE CODE  
(DKT. 1998)**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Supplemental Brief in Support of Its Motion to Compel Uber Source Code (Dkt. 1998).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 3	Entire Document

3. The entirety of Exhibit 3, contain highly confidential information technical information considered by an Ottomotto software engineer. Disclosure of this information could allow competitors to obtain a competitive advantage over Defendants by understanding this technical information.

4. Defendants' request to seal is narrowly tailored to the portions of Waymo's Motion and its supporting papers that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of October, 2017 in Washington, District of Columbia.

/s/ Michelle Yang

Michelle Yang

#### ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Michelle Yang has concurred in this filing.

Dated: October 18, 2017

/s/ Michael A. Jacobs

MICHAEL A. JACOBS